Telecommunications Engineering

LOCKARD & WHITE

Project Management

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September 19, 1995

Federal Communications Commission
Office of the Secretary
Room 222
1919 M Street
Washington, D.C. 20554

RM-8680

Attached is the original and five copies of Lockard & White's comments regarding;

PETITION FOR RULE MAKING
OF THE
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.,
AND
COUNCIL OF INDEPENDENT COMMUNICATIONS SUPPLIERS

In the matter of FCC licensing for radio technicians. We appreciate your consideration in this matter.

Very truly yours,

Charles M. White
Executive Vice President

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PETITION FOR RULE MAKING
OF THE
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.
AND
COUNCIL OF INDEPENDENT COMMUNICATIONS SUPPLIERS

Lockard & White, Inc. generally supports the efforts of the Industrial Telecommunications Association and the Council of Independent Communications Supplier in their petition for rule making to institute a Simplified Program for Licensing personnel working on Private Land Mobile Radio equipment with a few exceptions and comments as are noted on the following pages.

PRELIMINARY STATEMENT

Lockard & White, Inc. is a Texas corporation providing telecommunications consulting engineering services. The Company has been in business for over ten years and counts among its clients many large petroleum, utility and public safety entities on a world-wide basis. In the design and implementation of telecommunications systems, Company engineers must deal with installation and maintenance issues. This includes interfacing with the personnel who will do that work. It has been our observation that the technical expertise and influence of maintenance personnel has been slipping ever since Docket 83-322 was adopted.

With the FCC delegating a great deal of its authority to market forces and abdicating any help in resolving interference issues, it still is necessary to cope with the laws of physics in the proper operation of transmitting equipment and the resolution of interference problems as they occur. Since the laws of physics cannot be changed, modified or repealed by auctions or legislative action, a cadre of highly trained individuals must be available as problem solvers. These problems will become ever more acute as PCS and other transmitting systems overlay existing radio systems

Repealing the action in Docket 83-322 and reinstituting the requirement that an FCC licensed technician install, maintain or adjust transmitting equipment will go a long way in helping to solve existing and future technical, operational and licensing problems.

BACKGROUND

Since the FCC ceased requiring technicians to hold an operator's license issued by the FCC to maintain radio transmitting equipment, the quality of maintenance to radio systems has dropped dramatically. Most persons experienced in the industry at the time Docket 83-322 was adopted almost universally felt this would be the end result of this action and opposed the FCC in adopting this docket. The results have clearly justified this view. As an example: Recently, it was necessary to know the actual sensitivity of a receiver in a large 800 Mhz trunked system our Company was involved with. The technician charged with maintaining a particular site was asked to measure the receiver sensitivity but he said he didn't know how. Even though the FCC is primarily interested in transmitting

equipment, this person should have had to know how to check a receiver's sensitivity before being eligible to become a technician for the company he worked for. When the FCC adopted Docket 83-322, many companies who employed their own technicians also dropped the licensing requirement with the attendant skills level drop. When this happened, people with seniority, union affiliation or other standing within the company could apply for a higher paying job as a technician. Prior to 83-322, a person might have had other company prerequisites but an FCC General Class Radiotelephone License was absolutely necessary to even be considered for the position.

PROPOSAL

Persons installing, adjusting or maintaining **ANY**radio transmitter requiring an FCC transmitting license, except Amateur, should hold a valid FCC General Class Radiotelephone License, or higher operator's license. This radiotelephone license requirement should apply to all FCC licensees including those licensed under Parts 20, 24, 90(88), 94 and 99. Equipment installations should be made only under the direct supervision of a person possessing the aforementioned radiotelephone licensing requirements.

If, in the course of adjusting, maintaining or installing all types of radio transmitting equipment, a licensed technician finds the person or company requiring such work does not hold a valid FCC license for that equipment, he must inform the person or company ofthe following:

1. They do not hold a valid FCC license

2. Proper procedures for obtaining a license

3. All radio transmitting should be shut down until proper licensing can be obtained.

Additionally, the technician should be required by appropriate FCC rules to inform the nearest FCC field office of the infraction(s) found. Failure to do the above could be grounds for cancellation the technician's FCC operator's license.

After confirmation by the FCC that those persons or companies are not licensed, they should be notified of their violation(s) by the nearest FCC field office. They should then be given a suitable grace period in which to file for licensing. In hardship cases, the FCC field office could issue special temporary authority to permit continued operation until a license can be obtained. Failure to apply for a license should be followed by the issuance of letters of apparent violation with their usual penalties.

The efforts of NABER and others to fill the technician licensing void created by Docket 83-322 are commendable and should be continued. An FCC license could be issued upon proof of certification by these organizations.

To meet local requirements, however, FCC technician licensing could be expanded by having Volunteer Examiners, similar to those now in place for testing potential Amateur radio operators. There many well qualified individuals and companies willing and able to assume this responsibility. In so doing, the cost to the FCC for licensing technicians

would be held to a very reasonable level. The Volunteer Examiners should only recover their costs for testing, administrating and record keeping.

With the tremendous increase in radio frequency equipment being installed and utilized, caused by SMRS, Cellular, Trunking, PCS and complicated re-farming proposals, the burden of Rules enforcement is just to great for a downsized FCC to shoulder alone. There was once a powerful ally in licensed technicians. Their assistance can be regained with very little effort on the part of the FCC

It is not only necessary to have licensed technicians to help enforce the FCC's rules but they're also needed to cope with the laws of physics and rules of interference in a crowded RF world.

Lockard & White, Inc. strongly urges the Commission to take what ever action is necessary to restore the requirement that technicians servicing all FCC licensed transmitters, except Amateur, be required to hold a valid FCC General Radiotelephone License, or higher.

LOCKARD & WHITE, INC.

By: _____
Marcus J. Lockard, P. E.
President

By: _____
CharlesM. White
ExecutiveVicePresident

Date: September 15, 1995